

ORIGINAL

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U.S. DISTRICT COURT E.D.N.Y.

★ AUG 28 2017 ★

BROOKLYN OFFICE

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

KILRAIL BOWENS

Plaintiff,

[Insert full name of plaintiff/prisoner]

CIVIL RIGHTS COMPLAINT  
42 U.S.C. § 1983

JURY DEMAND

YES ☒ NO ☐

-against-

CO CASTILLO #11700  
CO VELEZ #18510  
CAPTAIN COHALL #1791  
CAPTAIN P. DESOUSA #1262  
ADW BLAIR #15

**CV 17-5133**

DeARCY HALL, J.

SCANLON, M.J.

Defendant(s).

[Insert full name(s) of defendant(s). If you need additional space, please write "see attached" and insert a separate page with the full names of the additional defendants. The names listed above must be identical to those listed in Part I]

- I. **Parties:** (In item A below, place your name in the first blank and provide your present address and telephone number. Do the same for additional plaintiffs, if any.)

A. Name of plaintiff KILRAIL BOWENS

If you are incarcerated, provide the name of the facility and address:

BROOKLYN DETENTION COMPLEX  
275 ATLANTIC AVENUE  
BROOKLYN N.Y. 11201

Prisoner ID Number: 3491611598

If you are not incarcerated, provide your current address:

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Telephone Number: 

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**B. List all defendants.** You must provide the full names of each defendant and the addresses at which each defendant may be served. The defendants listed here must match the defendants named in the caption on page 1.

Defendant No. 1

BLAIR  
Full Name  
DEPARTMENT OF CORRECTIONS - Dep #15  
Job Title  
275 ATLANTIC AVENUE  
BROOKLYN N.Y. 11201  
Address

Defendant No. 2

COHALL  
Full Name  
DEPARTMENT OF CORRECTIONS - CAPTAIN #1791  
Job Title  
275 ATLANTIC AVENUE  
BROOKLYN N.Y. 11201  
Address

Defendant No. 3

P. DESOUSA  
Full Name  
DEPARTMENT OF CORRECTIONS - CAPTAIN #1262  
Job Title  
275 ATLANTIC AVENUE

BROOKLYN N.Y. 11201  
Address

Defendant No. 4

CASTILLO  
Full Name

DEPARTMENT OF CORRECTIONS - SPECIAL TASK FORCE  
Job Title OFFICER  
#11700

275 ATLANTIC AVE

BROOKLYN N.Y. 11201  
Address

Defendant No. 5

VELEZ  
Full Name

DEPARTMENT OF CORRECTIONS - SPECIAL TASK FORCE  
Job Title OFFICER  
#18510

275 ATLANTIC AVE

BROOKLYN N.Y. 11201  
Address

**II. Statement of Claim:**

(State briefly and concisely, the facts of your case. Include the date(s) of the event(s) alleged as well as the location where the events occurred. Include the names of each defendant and state how each person named was involved in the event you are claiming violated your rights. You need not give any legal arguments or cite to cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. You may use additional 8 ½ by 11 sheets of paper as necessary.)

Where did the events giving rise to your claim(s) occur? 8B HOUSING UNIT  
UPPER 11 CELL AT BROOKLYN DETENTION COMPLEX

When did the events happen? (include approximate time and date) \_\_\_\_\_

AT 11:40 AM ON 08.09.17

Facts: (what happened?) ON 08-09-17 WHILE WAITING FOR SPECIAL TASK FORCE TO FINISH CONDUCTING THEY'RE SEARCH ON 8D HOUSING UNIT, THE SPECIAL TASK FORCE ENTERED 8B HOUSING UNIT FOR AN UNSCHEDULED SEARCH. ABOUT 15 INMATES WERE OCCUPYING THE DAYROOM. THE SPECIAL TASK FORCE BUSTED IN FORCING EVERYONE AGAINST THE WALL. THEY ESCORTED INMATES TO THE LOWER TIER TO BE SEARCHED FIRST. I ASKED WHY WERE WE BEING SEARCH. ONE OF THE OFFICERS WALKED UP BEHIND ME AND SCREAMED INTO MY EAR "SHUT THE HELL UP". DURING THE UPPER TIER SEARCH OFFICER VELEZ & CASTILLO BOTH SEARCHED MY CELL. NEAR THE END OF THEY'RE SEARCH, VELEZ PULLED OUT A LONG METAL ROD FROM HIS WAIST AND BEGAN TO DIG OUT A PAINTED CORKING AT THE BOTTOM OF THE TOILET'S BASE. HE SWIPED FROM THE BACK TO FRONT ATLEAST 8-TIMES BEFORE HE HELD UP A WHITE OBJECT. HE NOTIFIED HIS CAPTAIN WHO ASKED ME DID I INSPECT MY CELL BEFORE MOVING IN. I SAID YES BUT NOT TO DIG OUT THE PAINTED CORKING FROM AROUND THE TOILET'S BASE WHICH I HAVE EVIDENCE OF AND STAVED IT TO BING HEARING CAPTAIN #1262 - P. DESOUSA. LIKE I WOULD'VE KNOWN THERE WAS SOMETHING UNDER MY TOILET HIDDEN BEHIND SOME PAINTED CORKING. WE HAD PLENTY OF SEARCHES IN 8B AND NEVER ANY CONTRABAND WAS FOUND.

**II.A. Injuries.** If you are claiming injuries as a result of the events you are complaining about, describe your injuries and state what medical treatment you required. Was medical treatment received?

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III. Relief: State what relief you are seeking if you prevail on your complaint.

THE REMOVAL OF DISCIPLINARY ACTIONS AND \$250,000  
FOR MY PAIN AND SUFFERING.

I declare under penalty of perjury that on 08/16/17, I delivered this  
(date)  
complaint to prison authorities at BKDC to be mailed to the United  
(name of prison)  
States District Court for the Eastern District of New York.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: 08/16/17

Kabir Band  
Signature of Plaintiff

BROOKLYN DETENTION COMPLEX  
Name of Prison Facility or Address if not incarcerated

275 ATLANTIC AVENUE

BROOKLYN N.Y. 11201

Address

3491611598  
Prisoner ID#